

**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**South Central Regional Office**

**STATEMENT OF LEGAL AND FACTUAL BASIS**

Dominion Resources, Inc.  
5000 Dominion Boulevard, Glen Allen, Virginia  
Permit No. SCRO30867

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Dominion Generation has applied for a minor modification to the Title V Operating Permit for its Clover facility. The Department has reviewed the application and has prepared a proposed Title V Operating Permit.

Engineer/Permit Contact: \_\_\_\_\_

Date: May 14, 2004

Air Permit Manager: \_\_\_\_\_

Date: May 14, 2004

Regional Director: \_\_\_\_\_

Date: May 14, 2004

## **FACILITY INFORMATION**

### Permittee

Dominion Resources, Inc.  
5000 Dominion Boulevard  
Glen Allen, VA 23060

### Facility

Clover Power Station  
2.5 miles north of Clover near Route 600 in Halifax County

AIRS ID No. 21-083-0046

## **SOURCE DESCRIPTION**

Dominion-Clover Power Station (Clover) manufactures electricity and is covered by Standard Industrial Code 4911. The power station operates two, 4,085 MM Btu/hr pulverized coal fired boilers with associated coal, limestone, lime, ash, and fuel storage handling systems. Clover is a major source of NO<sub>x</sub> emissions and the primary boilers are subject to the federal NO<sub>x</sub> Budget Trading Program. As of August 29, 2003, Clover received approval by DEQ for their continuous emission monitoring system strategy for calculating NO<sub>x</sub> emissions. As a result, the specific applicable requirements of the NO<sub>x</sub> budget program are incorporated into the Title V permit.

The regulation allows the use of the minor modification procedure to add these new regulatory requirements. The NO<sub>x</sub> Budget Trading program becomes effective May 31, 2004.

## **COMPLIANCE STATUS**

The last inspection conducted at the facility by the Virginia Department of Environmental Quality was September 30, 2003. Results from that inspection determined Clover "out of compliance". However, on October 28, 2003, a follow-up enforcement report indicated the source's status returned to "compliance".

## **EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION**

The emissions units affected by the NO<sub>x</sub> trading program are two, 4,085 MMBtu/hr pulverized coal boilers (Unit ID ES-1, ES-2). These units are operated for the purpose of generating electricity. Both boilers are electrical generating units that were installed prior to 1999. As a result, the facility is required to measure and report the actual NO<sub>x</sub> emissions, and have planned to use an existing continuous emission monitoring system (CEMs). The CEM is set up to monitor NO<sub>x</sub>, CO<sub>2</sub>, and SO<sub>2</sub> emissions from each boiler. A continuous opacity monitor is also used to measure the opacity from each boiler's exhaust stack.

## **EMISSIONS INVENTORY**

A copy of the 2002 Comprehensive Environmental Data System (CEDS) annual emission update was submitted in May of 2003.

## **EMISSION UNIT APPLICABLE REQUIREMENTS - [001, 002]**

### **Limitations**

The following Virginia Administrative Code and New Source Performance Standards have specific emission requirements have been determined to be applicable:

9 VAC 5-140-10 et.seq., NO<sub>x</sub> Budget Trading Program (permit requirements, compliance certification, allowance allocations and transfers, tracking, monitoring, reporting, opt-in process, and account representatives) See attached permit for source specific limitations.

### **NO<sub>x</sub> BUDGET TRADING PROGRAM REQUIREMENTS**

This section represents the NO<sub>x</sub> Budget Trading permit, as required by 9 VAC 5-140-200 A, for each NO<sub>x</sub> Budget source required to have a federally enforceable permit. A monitoring system has been installed for the NO<sub>x</sub> Budget unit (Unit ID ES-1 and ES-2) for monitoring NO<sub>x</sub> mass emission in accordance with Subpart H of 40 CFR Part 75. The monitoring system has been certified under the procedures of 40 CFR Part 75 before the required date of May 1, 2003. Recording and reporting of NO<sub>x</sub> emissions are required to be done in accordance with the requirements of 9 VAC 5 Chapter 140, 40 CFR Part 75, and 40 CFR Part 97.

### **STREAMLINED REQUIREMENTS**

None associated with this minor permit modification.

### **INSIGNIFICANT EMISSION UNITS**

No additional insignificant emissions units identified.

### **PERMIT SHIELD & INAPPLICABLE REQUIREMENTS**

No inapplicable requirements have been identified.

### **GENERAL CONDITIONS**

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110, that apply to all Federally operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

### **COMPLIANCE PLAN**

N/A

### **CONFIDENTIAL INFORMATION**

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

### **PUBLIC PARTICIPATION**

The administrative corrections to this Title V permit as well as the inclusion of applicable NO<sub>x</sub> Budget conditions do not require a public participation period per 9 VAC 5-80-200 B.2., and 9 VAC 5-80-210 D.